

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,

v.

MATTHEW SCHWARTZ

Case No. 21 CR 316

Judge Andrea R. Wood

**MOTION FOR LEAVE TO FILE UNDER SEAL**

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully moves this Court, pursuant to Local Rule 26.2, to file certain exhibits to the government's response in opposition to defendant's motion for pretrial release under seal.

On January 28, 2022, the defendant filed a motion for pretrial release. Dkt. Entry 57. The government's response references 16 exhibits, three of which are recorded jail calls that may contain sensitive information, including personal identifying information of victims. The government has provided copies of all of the exhibits to counsel for defendant.

For the foregoing reasons, the government respectfully requests permission to file the exhibits under seal.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Kaitlin Klamann  
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Dated: February 4, 2022

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